

# Exhibit 59

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**From:** Kang, Katelyn L  
**Sent:** Monday, December 20, 2021 5:44 PM  
**To:** Christiana Holcomb; Brandon Steele; Jon Scruggs; Timothy Ducar  
**Cc:** Loree Stark; Barr, Andrew D; Avatara Smith-Carrington; Carl Charles; Tara Borelli; Reinhardt, Elizabeth F; Joshua Block; Taylor Brown; Veroff, Julie M.; Hartnett, Kathleen; Kang, Katelyn L; Sruti Swaminathan; 'kmorgan@baileywyant.com'; 'khammond@baileywyant.com'; 'mtaylor@baileywyant.com'; 'rgreen@Shumanlaw.com'; 'anortz@shumanlaw.com'; 'kbandy@shumanlaw.com'; 'susan.deniker@steptoe-johnson.com'; 'Jeffrey.Cropp@steptoe-johnson.com'; 'Curtis.R.A.Capehart@wvago.gov'; 'david.c.tryon@wvago.gov'; 'Doug.P.Buffington@wvago.gov'; Fox, Laticia  
**Subject:** Re BPJ v. West Virginia et al. - Plaintiff's First Set of Discovery Requests to Defendant Intervenor  
**Attachments:** BPJ First Set of ROGS - L. Armistead.pdf; BPJ First Set of RFP's L. Armistead.pdf

Counsel for Defendant-Intervenor:

Please see attached Plaintiff's First Set of Requests for Production and First Set of Interrogatories to Defendant-Intervenor Lainey Armistead.

In addition, Plaintiff notes that Defendant-Intervenor's Initial Disclosures are deficient (See Initial Disclosures Section II "Documents and tangible items"), and fails to disclose any documents or items that Defendant-Intervenor may use to support her claims or defenses. Plaintiff asks that Defendant-Intervenor promptly amend her Initial Disclosures to cure these deficiencies.

Thank you,  
Katelyn

**Katelyn Kang**  
Cooley LLP  
55 Hudson Yards  
New York, NY 10001-2157  
+1 212 479 6849 office  
+1 212 479 6275 fax  
[kkang@cooley.com](mailto:kkang@cooley.com)  
(Pronouns: she/her)

[www.cooley.com/people/katelyn-kang](http://www.cooley.com/people/katelyn-kang)

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